

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHUN-KO CHANG, YI RAN WANG, GUANEE  
XIE, and JOHN DOE, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

SHEN YUN PERFORMING ARTS, INC., FEI  
TIAN COLLEGE, FEI TIAN ACADEMY OF  
THE ARTS, DRAGON SPRINGS BUDDHIST  
INC., INTERNATIONAL BANK OF CHICAGO,  
SHUJIA GONG a/k/a TIANLIANG ZHANG,  
HONGZHI LI, and RUI LI a/k/a SANDY  
REBECCA LEE,

Defendants.

Case No. 24-8980 (PMH) (JCM)

**NOTICE OF MOTION REQUESTING LEAVE FOR PLAINTIFF JOHN DOE TO  
PROCEED PSEUDONYMOUSLY AND TO FILE CERTAIN PAPERS UNDER SEAL  
AND *EX PARTE***

PLEASE TAKE NOTICE THAT upon the concurrently filed memorandum of law and supporting papers, John Doe will move this Court at the United State Courthouse for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10601-4150, before Judge Philip M. Halpern, at a time to be decided, for an order granting John Doe to leave to proceed pseudonymously, and to file certain of the supporting papers under seal and *ex parte*.

Dated: May 8, 2025

Respectfully submitted,

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